

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA**

BRIANA BARBOSA,)	
)	
Plaintiff)	Civil Action File No.
vs.)	5:11-cv-00767-FL
)	
FIRST FEDERAL CREDIT CONTROL,)	
INC.,)	
)	
Defendant.)	
_____)	

**UNOPPOSED CONSOLIDATED MOTION AND BRIEF TO EXTEND THE
TIME FOR DEFENDANT TO RESPOND TO PLAINTIFF’S COMPLAINT**

COMES NOW, FFCC-Columbus, Inc., misidentified in the Complaint as “First Federal Credit Control, Inc.” (hereinafter referred to as “Defendant”) in the above-styled action, and submit this consolidated motion and brief requesting additional time to respond to Plaintiff’s Complaint as follows:

1.

This action was filed on or about December 30, 2011.

2.

Plaintiff filed an executed summons showing service as January 5, 2012; therefore making Defendant’s deadline to respond January 26, 2012.

3.

Undersigned counsel has recently been retained to appear and advocate a defense to Plaintiff’s Complaint.

4.

Counsel for the Defendant has conferred with Plaintiff's counsel regarding allowing counsel additional time to prepare a response to Plaintiff's Complaint, to discuss the facts, and to discuss potential resolution through and including February 9, 2012 to which counsel has graciously consented.

5.

This Court has the authority to extend the time period in which Defendant is required to file an Answer or otherwise respond to Plaintiff's Complaint. Defendant respectfully requests an extension of time to Answer or otherwise respond to Plaintiff's Complaint for the purpose of allowing counsel time to adequately review the Complaint, prepare a response, and contact opposing counsel to discuss the facts and potential resolution through and including February 9, 2012.

6.

Per Local Rule 6.1, Defendant has shown good cause for the extension, consulted with opposing counsel and opposing counsel has consented to the extension.

Respectfully submitted this 26th day of January, 2012.

BEDARD LAW GROUP, P.C.

/s/ Jonathan K. Aust

Jonathan K. Aust

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CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed this Unopposed Consolidated Motion and Brief To Extend The Time For Defendant To Respond to Plaintiff's Complaint using the CM/ECF system which will automatically send email notification of such filing to the following attorney of record:

Stacie Saunders-Watson
swatson@lemborglaw.com

Respectfully submitted this 26th day of January, 2012.

BEDARD LAW GROUP, P.C.

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